

EXHIBIT I

From: [Nicole E. Price](#)
To: [Innessa M. Huot](#); [Alex J. Hartzband](#)
Cc: [Mary Ellen Donnelly](#)
Subject: Re: Ruderman v. Law Office of Yuriy Prakhin et al
Date: Monday, March 08, 2021 12:54:35 PM

Innessa,

Defendants have provided information from Mr. Pusachev and repeatedly informed Plaintiff that his search of the IM messages was conducted according to the ESI Protocol. Moreover, Defendants have identified examples of messages which contain terms from the ESI Protocol. Defendants have also demonstrated that the messages were retrieved from multiple custodians. Accordingly, this issue should be resolved. Since Plaintiff is requesting this information and Defendants provided Plaintiff with all relevant information to resolve this issue, Plaintiff should draft the status report. Please provide us with a copy to review no later than 4pm today.

We are disappointed that Plaintiff has chosen not to work with Defendants on the subpoena issue, which could easily be resolved between the parties. Since Plaintiff has not produced any records from her cell phone, this subpoena would help both parties in obtaining information relevant to the claims and defenses in this litigation. We strongly urge Plaintiff to reconsider her position so the Court does not have to be involved in yet another unnecessary discovery dispute.

We will respond regarding the other discovery issues as soon as practicable.

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